

**ELIZABETH DAVIES, MD'S MEMORANDUM OF LAW IN  
SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

**EXHIBIT K**

**EXCERPT FROM DEPOSITION TRANSCRIPT OF  
DARLA WELKER  
[12-14-2020]**



Deposition of:  
**Darla A. Welker**

*December 14, 2020*

In the Matter of:  
**Holliman, Michelle v. We Are Sharing  
Hope SC, et al**

**A. William Roberts, Jr & Assoc.**  
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1 DARLA A. WELKER

2 being first duly sworn, testified as follows:

3 EXAMINATION

4 BY MS. DINKINS:

5 Q Good morning, Ms. Welker. Thank you  
6 very much for being here this morning. I  
7 appreciate your time.

8 A Good morning.

9 Q As you just heard, my name is Lucy  
10 Dinkins, and I represent the plaintiff, Michelle  
11 Holliman. She's brought a lawsuit both  
12 individually and as the personal representative of  
13 the Estate of Allen Holliman against We Are  
14 Sharing Hope, MUSC, and UNOS.

15 Do you understand that you're here  
16 today to give testimony in connection with this  
17 case brought by Mrs. Holliman?

18 A I do.

19 Q Before we begin, I'd like to go over  
20 just a few of the rules and procedures governing  
21 the deposition. If you could please remember to  
22 answer all of the questions with a clear verbal  
23 answer so that the court reporter can accurately  
24 record your answer.

25 And also, please try to wait until I

1 I don't know what their practice is on that  
2 perspective.

3 Q What sort of information does WASH  
4 provide to transplant centers regarding a donor?

5 A Basically, the entire medical record  
6 as we have it.

7 Q So everything that WASH has on a donor  
8 it would give to a transplant center?

9 A That's the purposes of having the  
10 medical record in DonorNet is for the transplant  
11 surgeons to review the information prior to  
12 accepting the organ.

13 Q And why is that information provided  
14 to transplant centers?

15 A It gives them opportunity to evaluate  
16 the donor's record.

17 Q And would you say it gives them the  
18 opportunity to confirm whether a donor is suitable  
19 for their patient?

20 A I can't answer that question for the  
21 transplant center. You'll have to ask them that.

22 Q I'm going to mark the next exhibit.

23 (Plaintiff's Exhibit 13, DonorNet  
24 Documents [WASH 53, 54, 58, 91, 93, 94, 248-258,  
25 262-265, MUSC\_Subpoena 90-100], were marked for